



STATE OF CALIFORNIA
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD

DIVISION OF WATER RIGHTS

RIGHT TO DIVERT AND USE WATER

APPLICATION T032945

TEMPORARY PERMIT 21409

Permittees:

City of Huron
36311 South Lassen Avenue
Huron, CA 93234

Arroyo Pasajero Mutual Water Company
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The State Water Resources Control Board (State Water Board) authorizes the diversion and use of water by the Permittees in accordance with the limitations and conditions herein SUBJECT TO PRIOR RIGHTS. The priority of this temporary permit dates from **July 16, 2018**. This right is issued in accordance with the State Water Board delegation of authority to the Executive Director (Resolution 2012-0029) and redelegation of authority to act upon applications for temporary permits by the Executive Director to the Deputy Director for Water Rights, dated October 19, 2017.

Application for Temporary Permit

The City of Huron (City) and Arroyo Pasajero Mutual Water Company (APMWC) (Applicants or Permittees) filed Application T032945 on July 16, 2018, to appropriate water by temporary permit pursuant to Water Code section 1425 et seq. The Applicants propose to divert up to 13,513 acre-feet (af), at a maximum rate of 40.2 cubic feet per second (cfs), from the West Side Detention Basin (detention basin) to underground storage in the Westside Subbasin for later municipal and irrigation use. Diversions are proposed from November 1, 2018 through April 30, 2019, and infiltration would occur on up to 504 acres of agricultural fields owned by members of the APMWC and approximately 34 acres of percolation ponds owned by the City. Water stored underground would be extracted at 16 existing wells for municipal use within the City boundaries and for irrigation use on up to 6,664 acres of field crops and pistachio orchards owned by members of the APMWC. The stored water is expected to be put to use during the 2019 irrigation season.

Arroyo Pasajero terminates at the detention basin along the western embankment of the San Luis Canal, a segment of the California Aqueduct. The detention basin, owned by the U.S Bureau of Reclamation (USBR) and managed by the California Department of Water Resources (DWR), is designed to store floodwater and sediment west of the San Luis Canal. During winter flows, water from Arroyo Pasajero builds up against the San Luis Canal in the detention basin and overflows onto adjacent private property; during large rain events, the overflow from the detention basin can flood two main roads, Lassen and Gale Avenues. Temporary pumps and unburied aluminum pipe will be placed at three locations along the detention basin, and water will be pumped from the detention basin to 34 acres of percolation ponds owned by the City and up to 504 acres of agricultural land adjacent to the detention basin. The two pumps directing water to agricultural fields (Points of Diversion [PODs] 1 and 2) would each divert at a maximum rate of 20 cfs, and the pump directing water to the City's percolation ponds (POD 3) would divert at a maximum rate of 100 gallons per minute (0.2 cfs). On the agricultural land, small, temporary berms would be plowed up to retain water on the fields for infiltration. Only previously disturbed land would be affected.

Diversion to underground storage would be measured by flow meters at the PODs. Beneficial use would be measured by flow meters installed at the recovery wells. The landowners of the 6,664 acres already extract groundwater for irrigation, and the project would not expand the number of acres of land under cultivation. According to the Applicants, the City receives water from the Central Valley Project (CVP) for municipal use, but during the drought the City proposed an emergency action to augment limited supplies by purchasing water from nearby agricultural wells, including one of the production wells identified in the temporary permit application. The Applicants expect all of the water stored under the temporary permit to be put to beneficial use during the following irrigation season. In the next two to three years, the City plans to construct a new municipal well to provide a back-up source of water when CVP deliveries are insufficient for the City's needs.

Application T032945 was noticed on August 1, 2018 and no objections were received; however, the State Water Board has ongoing authority to adjust the terms and conditions of a temporary permit in light of new information. The Division received a comment letter from Westlands Water District (District), the Groundwater Sustainability Agency for the Westside groundwater subbasin. The District did not oppose the project but recommended that the Applicants consult with the District to develop management strategies with respect to groundwater recharge and quantifying the benefits of such replenishment activities within the subbasin. According to the Applicants, they have begun consultation with the District regarding the above-mentioned letter, with the goal of incorporating these benefits into the Groundwater Sustainability Plan.

Previous Temporary Permit 21385 (Application T032842)

On December 1, 2017, the State Water Board issued Temporary Permit 21385. The temporary permit authorized diversion of up to 13,513 af, at a maximum rate of 40.2 cfs from the detention basin to underground storage in the Westside Subbasin for later municipal and irrigation use from the date of issuance of the permit through April 30, 2018. The authorized place of use included up to 5,657 acres within the Arroyo Pasajero Mutual Water Company service area and the city limits of the City of Huron. The project description of T032842 is identical to the application for Temporary Permit 21385 and would be a renewal of the previous temporary permit.

On July 31, 2018, the Permittees submitted a summary report of diversions and compliance with the terms of Permit 21385. Total water diversions to underground storage was 89.94 af, which was far less than the authorized amount. Only POD #2 was used for diversion, with an average diversion rate of 3.49 cfs. No water was applied to land receiving dairy byproducts. The fields that were inundated have been operating under management practices for fertilizer application for at least two growing seasons and the Permittees report that the field had no fertilizer applied to it within three months prior to the diversion of water.

The application for T032842 stated that the stored water was expected to be put to use during the 2018 irrigation season. As of July 31, 2018, no water has been extracted and put to beneficial use for irrigation in accordance with permit term 0510301. The City indicated bylaws have not yet been completed to cover the extraction of water by individual landowners. The City anticipates the signed bylaws (see permit term 0510301) will be completed by October of 2018.

California Environmental Quality Act

Ordinarily, the State Water Board must comply with any applicable requirements of the California Environmental Quality Act (CEQA) prior to issuance of a temporary permit pursuant to Water Code section 1425 et seq. However, on April 6, 2017, Governor Edmund G. Brown Jr. issued Executive Order B-39-17. Item 3 of the Executive Order suspends CEQA for purposes of carrying out the directives in the order, including the issuance of temporary permits to capture high runoff events for local storage or recharge. Item 14 of the Executive Order requires the State Water Board to prioritize temporary water right permits to accelerate approvals for projects that enhance the ability of a local or state agency to capture high runoff events for local storage or recharge, consistent with water rights priorities and protections for fish and wildlife. The CEQA suspension applies to any actions taken by state agencies, and for any necessary permits or approvals required to complete these actions.

The City filed a Notice of Exemption (NOE) for the project on September 7, 2018. The State Water Board has reviewed the information submitted by the City and has made an independent finding that the proposed project is consistent with the suspension of CEQA in Executive Order B-39-17. The State Water Board will issue a NOE for the proposed project within five days of issuance of the temporary permit.

Requirements of Water Code section 1425

Before making the findings required by Water Code section 1425, the State Water Board must: (a) review available records, files, and decisions which relate to the availability of water from the source at the proposed PODs to serve the proposed temporary diversion and use, and which relate to the rights of downstream users; and (b) consult with representatives of the Department of Fish and Wildlife (CDFW). (Wat. Code, § 1427.) Division staff consulted with representatives from CDFW starting on July 24, 2018 and CDFW submitted a comment letter, discussed further below, on August 31, 2018.

Division staff has reviewed available records, files and decisions relating to the availability of water for the project and the rights of downstream users. Division staff estimated that diversion of 13,513 af from the detention basin could have been fulfilled from November 1 through April 30 in 18 out of the past 84 years, based on streamflow data at the upstream Los Gatos Creek gage, which is maintained by DWR and located seven miles upstream of the detention basin. Under Permit 21385 which authorized diversion from November 1, 2017 until April 30, 2018, Permittees diverted only 89.94 af to underground storage (0.67% of the authorized amount of up to 13,513 af) as 2018 was not a wet year. The Department of Water Resources May 1, 2018 San Joaquin Valley Water Year Index indicated a below "Normal" water year type. The diversion occurred only at POD #2, for 13 of the 180 days authorized, at a rate of 3.49 cfs (91% less than the maximum rate of 40.2 cfs).

The Applicants Have an Urgent Need for the Water

The State Water Board finds that the Applicants have an urgent need for the water proposed to be diverted and used. The Westside Subbasin is located within the San Joaquin Basin and has been designated a high-priority basin by DWR due to its irrigated acreage, reliance on groundwater in the basin, and the potential for undesirable results caused by ongoing overdraft. DWR also considers the sub-basin to be in critical overdraft, meaning continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts. Pursuant to the Governor's Executive Order B-40-17, the January 17, 2014 Drought State of Emergency is still in place for Fresno County. An urgent need for the requested temporary permit exists here to increase the yield of available water supplies and enhance water reliability for municipal and agricultural uses during drought conditions.

Water Code section 1425, subdivision (c), also provides that an "urgent need" exists when the Board, in its judgment, concludes that the proposed temporary diversion and use is necessary to further the constitutional policy that water resources of the state be put to beneficial use to the fullest extent of which they are capable and that waste of water will be prevented. Flows in the Arroyo Pasajero have a large seasonal and annual variability, and are not currently captured for beneficial use above incidental natural recharge to the aquifer. The diversion from these flows furthers the policy of capturing and putting this water to beneficial use.

The Water May Be Diverted and Used Without Injury to Any Lawful User of Water

Per the State Water Board's eWRIMS database, no senior surface water users are located at the detention basin, where the Arroyo Pasajero terminates. Consequently, no surface water users would be injured by the diversion.

In the absence of the project, some natural groundwater recharge would occur in the detention basin; however, according to the Applicants, soil pores at the bottom of the detention basin are sealed with silt that is conveyed with the water from the Arroyo Pasajero watershed. Based on data from within the detention basin in March and April 2001, March 2010, and April 2011, the Applicants estimate infiltration rates in the detention basin range from 0.10 to 0.15 foot per day. Unlike the detention basin, the agricultural fields are regularly tilled and ripped as part

of normal agricultural practices, which improves infiltration. Based on anecdotal irrigation information for the agricultural land proposed to be inundated under the temporary permit, the Applicants believe infiltration rates for the agricultural fields may range from 0.35 to 0.45 foot per day. The City's estimate for the infiltration rate in the City's percolation ponds, 0.009 foot per day, is lower than estimated rates for the detention basin, but the percolation ponds only make up approximately six percent of the total acreage of proposed infiltration areas. Moreover, the Applicants believe the method used to develop the estimate may not have been appropriate for determining daily infiltration rates under inundated conditions, and propose the infiltration rate may be substantially higher because the soil characteristics in the ponds are similar in nature to the soil of the nearby agricultural fields. Consequently, the Applicants have indicated the infiltration rate in the ponds may be in the range of 0.35 to 0.45 foot per day. Because the project is expected to increase recharge to the aquifer above background levels, and because the water diverted under the temporary permit would not be used to expand existing agricultural water use in the area, the water can be diverted and used without injuring other lawful users of groundwater.

The Water May Be Diverted and Used Without Unreasonable Effects upon Fish, Wildlife, or other Instream Beneficial Uses

The Arroyo Pasajero is an intermittent stream that terminates at the detention basin, and is not known to support fish, recreation, or other instream beneficial uses. CDFW staff did not communicate concerns related to aquatic or aquatic-dependent species. Aside from temporary placement of three pumps and associated above-ground piping and diversion of water, the project does not involve changes to the detention basin or removal of any riparian vegetation.

Staff reviewed records from CDFW's California Natural Diversity Database that indicate western spadefoot toad (*Spea hammondi*), a candidate species under the federal Endangered Species Act, may be present in the detention basin. Western spadefoot are almost completely terrestrial, but do enter water to breed in temporary pools and drainages formed by winter and spring rains. Although the project would involve diversion of water from the detention basin, based on the size of the detention basin and heterogeneity of surfaces within it, apparent from aerial photographs, it is unlikely that diversion of water at three points in the southern portion of the detention basin would substantially affect the availability of temporary pools potentially used by western spadefoot toad during the breeding season (January to May). From river stage data at the southern border of the detention basin, water levels in the southern portion of the detention basin vary drastically year to year, and species in the detention basin have presumably adapted to substantial variability in water levels.

On August 31, 2018, the Division received a letter from CDFW commenting on the proposed project. CDFW identified potential impacts to the following terrestrial species: burrowing owl (*Athene cunicularia*), a state species of special concern; San Joaquin kit fox (*Vulpes macrotis mutica*), a federally endangered and state-threatened species; and Swainson's hawk (*Buteo swainsoni*), a state-threatened species. CDFW indicated that the above-listed species could be affected as a result of ground disturbing activities such as grading and flooding within agricultural areas. Berming and inundation activities could collapse or disturb San Joaquin kit fox dens and burrowing owl burrows and cause adult burrowing owls to abandon nests, and ground-disturbing activities during the nesting season near Swainson's hawk nests may lead to nest failure. According to CDFW staff, Swainson's hawk in the Central Valley may nest as early as February 1. Executive Order B-39-17 specifically applies to projects consistent with protections for fish and wildlife. To ensure the State Water Board's approval is consistent with Executive Order B-39-17, terms have been included requiring pre-construction surveys and avoidance measures to protect these special-status species and their habitats. CDFW also requested notification from the Applicants if the project would substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel, or bank of, any river, stream or lake; or deposit or dispose of debris, waste, sediment, or other material containing crumbled, faked, or ground pavement where it may pass into any river, stream, or lake.

The Proposed Diversion and Use is in the Public Interest

The proposed diversion, storage, and use of water are in the public interest. Capture and storage of flows that would otherwise be unused will mitigate effects of the recent drought on water supplies for agriculture, businesses, communities, and fish and wildlife. Augmentation of groundwater supplies will enhance local drought resilience, particularly in a basin in critical overdraft. The California Natural Resource Agency's California Water Action Plan, originally released in 2014 and updated in 2016, calls for increased regional self-reliance and integrated water management, including conjunctive use of groundwater and surface water supplies.

The proposed diversion represents an ongoing pilot project that could help demonstrate the feasibility of projects that use available winter precipitation events to recharge local aquifers. In a wet year, the project may also help relieve nearby flooding caused by overflow from the detention basin. The project may provide the basis for a standard permit application by the Applicants to divert water from winter precipitation events to underground storage for use within the proposed places of use.

The Central Valley Regional Water Quality Control Board (Regional Board) has identified potential groundwater quality impacts from inundating agricultural fields outside of the irrigation season for groundwater recharge. Terms are included in this temporary permit to protect against adverse impacts to groundwater quality by requiring that lands used for infiltration be in compliance with the Regional Board's Irrigated Lands Regulatory Program or be managed under management practices for fertilizer application.

Findings Pursuant to Water Code section 1425

The State Water Board finds that, subject to the terms and conditions included in this temporary permit: (1) the Applicant has an urgent need for the proposed diversion and use of water; (2) the water may be diverted and used without injury to any lawful user of water; (3) the water may be diverted and used without unreasonable effect upon fish, wildlife, or other instream beneficial uses; and (4) the proposed diversion and use is in the public interest. (Wat. Code, § 1425, subd. (b).) The State Water Board has also complied with its independent obligation to consider the effects of the proposed project on public trust resources and to protect these resources where feasible. (*National Audubon Society v. Superior Court* (1983) 33 Cal.3d 419 [189 Cal.Rptr. 346, 658 P.2d 709].)

This temporary permit does not create a vested right, even of a temporary nature. (Wat. Code, § 1430.) This temporary permit is not precedential to future permitting actions for this or other similar projects.

Permittees are hereby authorized to divert and use water as follows. No water shall be diverted or used under this water right unless right holder is in compliance with the terms and conditions herein:

1. Source of water: **West Side Detention Basin**

tributary to: **Arroyo Pasajero**

within the County of **Fresno**.

2. Locations of points of diversion to underground storage and infiltration areas.

By California Coordinate System of 1983 in Zone 4	40-acre subdivision of public land survey or projection thereof	Section	Township	Range	Base and Meridian
Temporary Pump 1 North 1,956,297 feet and East 6,249,741 feet	NW ¼ of NE ¼	18	20S	18E	MD

Temporary Pump 2 North 1,952,228 feet and East 6,249,738 feet	NW ¼ of SE ¼	18	20S	18E	MD
Temporary Pump 3 North 1,961,709 feet and East 6,246,553 feet	SE ¼ of SE ¼	1	20S	18E	MD
Infiltration Areas	504 acres of existing agricultural fields and 34 acres of existing percolation ponds, as shown on map filed with the State Water Board.				

3. Purposes of use	4. Place of use
Irrigation	Up to 6,664 acres within the Arroyo Pasajero Mutual Water Company service area boundary as shown on map filed with the State Water Board.
Municipal	Within the city limits of the City of Huron as shown on map on file with the State Water Board.

The place of use is shown on map, dated July 16, 2018, filed with the State Water Board.

5. The water appropriated shall be limited to the quantity of water which can be beneficially used and shall not exceed **13,513 acre-feet** by diversion from the West Side Detention Basin to underground storage, to be collected from November 1, 2018 to April 30, 2019. The maximum rate of diversion from the West Side Detention Basin to underground storage shall not exceed **40.2 cubic-feet per second**. The amount of water that may be extracted from storage under this permit shall not exceed the volume of water diverted less any evaporative loss that occurs after diversion but prior to infiltration. This permit will be effective on November 1, 2018 and expires on April 30, 2019 (**180 days**), but may be renewed by the State Water Board.

(0000005C, 0000005J, 0510700)

6. No water shall be diverted under this temporary permit unless the Permittees monitor and record the rate of diversion and quantity of water diverted to underground storage and total amount placed to beneficial use under this temporary permit. Permittees shall use a measuring device or other method satisfactory to the Deputy Director for Water Rights. The device or method shall be capable of quantifying the hourly rate and volume of diversion and shall be properly maintained.

Permittees shall maintain a daily record of the volume of water diverted and the maximum daily rate of water diverted. If Permittees are using any of the points of diversion under other rights, the record of diversion shall be separately quantified. Permittees shall also record the total quantity of water placed to beneficial use. A copy of the records shall be submitted with the report required by Term 0100500 or whenever requested by the Division of Water Rights.

The issuance of this water right does not affect the applicability of measuring and monitoring requirements of California Code of Regulations, title 23, chapters 2.7 and 2.8. If there is any conflict or inconsistency between conditions in this right for measurement, monitoring, and reporting of water use, and applicable regulations, the more stringent requirement or requirements shall control in each instance.

(0109999)

7. Permittees shall submit a report to the State Water Board within 60 days after the expiration of this permit. The report shall include the total quantity of water diverted under this temporary permit and any other amounts diverted from the point of diversion under other bases of right during the reporting period, the

quantity of water applied to beneficial use, and a map of the location and acreage of fields used for infiltration. The report shall also include daily records of the volume and the maximum rate of water diverted under this temporary permit.

(0100500)

8. No water stored under this temporary permit shall be extracted for beneficial use other than municipal use by the City of Huron, until the Arroyo Pasajero Mutual Water Company has developed bylaws, an operating agreement, or other formal agreements for accounting for use of the stored water by its members. Permittees shall submit a copy of such bylaws or agreements, as necessary to confirm beneficial use of water stored under this temporary permit, with the report required by Term 0100500.

(0510301)

9. If Permittees intend to store water diverted under this temporary permit beyond September 30, 2019, Permittees must submit a plan to the Deputy Director prior to the expiration of this permit detailing how Permittees will calculate the expected losses of the stored amount over time, including timelines for any field or modeling investigations that will be conducted.

(0490800)

10. Prior to ground-disturbing activities including grading and flooding within agricultural areas conducted for diversion or storage of water under this permit, a qualified biologist shall conduct pre-construction surveys for San Joaquin kit fox (*Vulpes macrotis mutica*) and burrowing owl (*Athene cunicularia*) according to standard protocols in the area to be affected by ground-disturbing activities. Pre-construction surveys for San Joaquin kit fox shall be conducted 14 to 30 days prior to ground disturbance.

If burrowing owl burrows are identified, Permittees shall establish buffers around the burrows within which no ground-disturbing or inundation activities may occur unless a qualified biologist, approved by the California Department of Fish and Wildlife, verifies through non-invasive methods that either the birds have not begun egg-laying and incubation, or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. Buffers shall be consistent with the California Department of Fish and Wildlife's 2012 Staff Report on Burrowing Owl Mitigation.

If San Joaquin kit fox dens are identified, Permittees shall consult with the California Department of Fish and Wildlife to determine if avoidance is feasible or if an incidental take permit is necessary.

Permittees shall submit the results of the pre-construction surveys to the Deputy Director of Water Rights and the California Department of Fish and Wildlife within ten days of completion of the surveys. In the event burrows or dens are identified, Permittees shall document compliance with this term in the report required by Term 0100500 or whenever requested by the Division of Water Rights.

(0400505)

11. No more than 10 days prior to ground-disturbing activities for diversion or storage of water under this permit conducted after February 1, a qualified biologist shall conduct a pre-construction nesting survey for Swainson's hawk (*Buteo swainsoni*) according to standard protocols in the area to be affected by the ground-disturbing activities. If any Swainson's hawk nests are identified, Permittees shall establish 0.5-mile buffers around the nests within which no ground-disturbing or inundation activities may occur until September 15 or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If implementation of a 0.5-mile buffer is not feasible, Permittees shall consult with the California Department of Fish and Wildlife to determine if project activities can avoid take. If take cannot be avoided, then the acquisition of an Incidental Take Permit pursuant to Fish and Game Code section 2081(b) is necessary prior to initiating activities to comply with the California Endangered Species Act.

Permittees shall submit the results of any pre-construction survey to the Deputy Director of Water Rights and the California Department of Fish and Wildlife within ten days of completion of the survey. In the event nests are identified and buffers established around the nests, Permittees shall document compliance with this term in the report required by Term 0100500 or whenever requested by the Division of Water Rights.

(0400506)

12. No agricultural field shall be inundated for infiltration under this temporary permit unless:

- a) the field has been in compliance with the Irrigated Lands Regulatory Program for, at minimum, the two most recent growing seasons; or
- b) the following apply:
 - i. the field has been operated under management practices for fertilizer application for at least two growing seasons; and
 - ii. the field has not had fertilizer applied within the last three months.

Permittees shall document compliance with this term. A copy of the documentation shall be submitted with the report required by Term 0100500 or whenever requested by the Division of Water Rights.

(0400501)

13. No water shall be applied to dairy land application areas for infiltration under this temporary permit unless the Permittees have provided notification and received concurrence from staff of the Central Valley Regional Water Quality Control Board. Permittees shall, within 15 days of issuance of any concurrence, transmit copies to the Division of Water Rights.

(0390501)

14. The Permittees must cease diversions at the direction of the Deputy Director for Water Rights. The Deputy Director will direct the Permittees to cease diversions upon a finding that the diversion threatens to injure downstream senior right holders, or the diversion creates a threat to human health and safety.

(0359999)

15. Water applied for infiltration outside of the Permittees' infiltration basins shall only be applied to previously irrigated and developed agricultural fields not being used for crop production at the time of application.

(0400500)

16. The State Water Board may supervise diversion and use of water under this temporary permit for the protection of lawful users of water and instream beneficial uses and for compliance with permit conditions. Permittees shall allow representatives of the State Water Board and other parties, as may be authorized from time to time by the State Water Board, reasonable access to project works to determine compliance with the terms of this temporary permit.

(0480600)

17. This temporary permit is subject to California Water Code, Division 2, Chapter 6.5, section 1425 et seq. Any temporary permit issued under this chapter shall not result in creation of a vested right, even of a temporary nature, but shall be subject at all times to modification or revocation at the discretion of the State Water Board.

(0510800)

18. Issuance of this temporary permit shall not be construed as indicating State Water Board approval of water rights requested under other applications.
(0510999)
19. Permittees shall promptly submit any reports, data, or other information that may reasonably be required by the State Water Board, including but not limited to documentation of water diversion and documentation of compliance with the terms and conditions of this temporary permit.
(0000010)
20. No water shall be diverted or used under this temporary permit unless Permittees have obtained and are in compliance with all necessary permits or other approvals required by other agencies.
(0000203)
21. This temporary permit does not authorize any act which results in the taking of a candidate, threatened or endangered species or any act which is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish & G. Code, § 2050 et seq.) or the federal Endangered Species Act (16 U.S.C. § 1531 et seq.). If a "take" will result from any act authorized under this temporary permit, Permittees shall obtain any required authorization for an incidental take prior to construction or operation of the project. Permittees shall be responsible for meeting all requirements of the applicable Endangered Species Act for the project authorized under this right.
(0000014)

STATE WATER RESOURCES CONTROL BOARD

ORIGINAL SIGNED BY:

Erik Ekdahl, Deputy Director
Division of Water Rights

Dated: OCT 25 2018